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ev. 08/09) Criminal Complaint

Special Agent

: Joel Kelso, FBI

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UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Keeman Bridges

Case:2:16-mj-30477  
Judge: Unassigned,  
Filed: 10-20-2016 At 04:13 PM  
SEALED MATTER (LH)

Defendant(s).

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CRIMINAL COMPLAINT

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I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of February 20, 2016, in the county of Wayne  
in the Eastern District of Michigan, the defendant(s) violated:

*Code Section*

18 U.S.C. §§1029(a)(4) and (c)(1)(A)(ii)

*Offense Description*

Possession of Access Device Making Equipment

This criminal complaint is based on these facts:

See Affidavit



Continued on the attached sheet.

  
Complainant's signature

S/A Joel Kelso, FBI

Printed name and title

Sworn to before me and signed in my presence.

OCT 20 2016

Date: \_\_\_\_\_

  
Judge's signature

City and state: Detroit, Michigan

Hon. David R. Grand, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT**

I, Joel Kelso, being duly sworn, depose and state the following:

**INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since August 31, 2009 at Detroit, Michigan. I am currently assigned to the Violent Gang Task Force where I work a variety of criminal matters including but not limited to violent crimes and the apprehension of federal fugitives. During my career with the FBI, I have utilized a variety of investigative methods including search warrants, surveillance, interviews, and federal grand jury subpoenas.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including communications with others who have personal knowledge of the events and circumstances described herein, oral and written reports about this investigation which your affiant received, directly or indirectly from other law enforcement personnel, as well as information gained through my training and experience.

3. The information outlined below is provided for the limited purpose of establishing probable cause, and does not contain all details or all facts which exist pertaining to this investigation. This affidavit is provided in support of an application for a complaint and an arrest warrant of KEEMAN BRIDGES d/o/b

\*\*/\*\*/1993. There is probable cause to believe that BRIDGES violated Title 18, United States Code, Section 1029(a)(4) and (c)(1)(A)(ii) (Possession of Access Device Making Equipment), and Title 18, United States Code, Section 1029(a)(3) and (c)(1)(A)(i) (Possession of Counterfeit Access Devices).

### INVESTIGATION & PROBABLE CAUSE

4. The “Bandgang” is a local Detroit street gang founded in Detroit, Michigan, in 2013. It is also known as “Bandgang Shredgang,” BMBG (Big Money Bandgang), and TF (The Family).

5. The existence and structure of Bandgang is well-documented by the Detroit Police Department and the Federal Bureau of Investigation (FBI). In 2013, select gang members from four smaller local Detroit street gangs joined together to form Bandgang. The gang members came from MVHN (Most Valuable Hood Niggas), Hard Work, TTO (The Take Over), and MPR (Money Power Respect). Bandgang now boasts approximately 65 members.

6. Bandgang’s base of operation is primarily on the west side of Detroit. Specifically, Bandgang claims the area north of Fenkell to Outer Drive with a western boundary of Greenfield Highway and an eastern boundary of Schaefer Highway as their territory. Bandgang violently defends its territory from rival gangs

by shooting rival gang members that enter it. Some Bandgang members live in the suburbs of Detroit, and the gang members conduct gang and criminal activity in numerous cities in the State of Michigan. Bandgang also conducts their gang and criminal activity in Pennsylvania, Virginia, Ohio, Nebraska, and Canada.

7. Bandgang members indicate their affiliation with the gang by displaying hand gestures (gang signs), obtaining tattoos, and wearing clothing that says "Bandgang," "Shredgang," "BMBG," and "The Family." Bandgang members also wear jewelry such as necklaces and rings that say "Bandgang," "Shredgang," and "BMBG." Additionally, the jewelry and rings will also have the gang members' street names after "Bandgang," "Shredgang," or "BMBG," such as Bandgang Biggs.

8. Bandgang members also proclaim their affiliation with Bandgang, highlight the existence of the gang, and gang-related "accomplishments" by posting photographs, videos, and messages on various internet social networking sites. Bandgang has their own language that members use to communicate with each other. For example, members replace letters with numbers that correspond to a telephone keypad. For example, Bandgang members will identify themselves with 677, which is MPR (Money Power Respect). Bandgang members also use code words to describe their illegal activity. For example, they use "cheese" for money, "swipping" for conducting illegal credit card fraud, "bins" for batches of illegally obtained credit card numbers, and "choppas" for assault rifles.

9. Bandgang derives its income from the manufacture and use of fraudulent credit cards, selling illegal narcotics, as well as armed robberies of persons and vehicles that affect interstate commerce, and a variety of other criminal methods. Members of Bandgang have also engaged in shootings, assaults, homicides, and threats of intimidation.

10. Members and associates of Bandgang utilize cellular phones and computers to communicate with one another to plan specific acts of violence and other crimes, to discuss past criminal activity, to coordinate the sale of illegal narcotics, to acquire and use fraudulent credit cards, and to further the goals of the gang. Bandgang members also use multiple social media networks to monitor, track, and communicate with other members in furtherance of Bandgang. Many times, these above-mentioned criminal activities are made through internet connections with their cellular phones.

11. The investigation has identified Keeman Bridges as a member of Bandgang. Bridges utilizes the street name "Keemo" and is a self-proclaimed member of the gang.

12. On February 20, 2016, an attempted murder of four (4) victims occurred at 16XXX Mark Twain, Detroit-the home of Bridges. During the shooting, a 5 year old victim was shot in the head and suffered a serious injury. Immediately after the shooting, Detroit Police Officers arrived on the scene. The outside of the residence

showed recent signs of gunfire damage from being shot when the victim's father returned fire. Fearing that other injured victims may be present inside 16XXX Mark Twain, Detroit, Michigan; the officers forced entry inside the location. Once inside, officers observed an AK-47 style assault pistol/rifle which was still warm to the officer's touch. The location was secured while a search warrant was obtained.

13. On February 20, 2016, a State of Michigan search warrant was issued and executed at 16XXX Mark Twain, Detroit Michigan. In addition to two AK-47 style assault rifles, a Wonder Manual Embosser machine, an MSR605 Magnetic Stripe Card Reader Writer Encoder aka credit card skimmer, a Dymo Label Maker, a Lenovo Laptop computer, an Apple Mac Book computer, and 29 fraudulent credit cards were discovered. Your affiant knows that a Wonder Manual Embosser, and MSR605 Magnetic Stripe Card Reader Writer Encoder, a Dymo Label Maker, a Lenovo Laptop computer, and Apple Mac Book computer, can be used to make fraudulent credit cards.

14. Examination of the 29 fraudulent credit cards determined the stolen account numbers that were encoded onto the magnetic stripes on the back of the cards belonged to Toronto-Dominion Bank and Desjardins Bank. Said cards and account numbers are counterfeit access devices as defined Title 18, United States Code, Section 1029(e)(2). Both of these banks are located in Canada.

15. On February 25, 2016, Special Agents and Task Force Officers interviewed Keeman Bridges. Bridges admitted to owning the credit card embosser, credit card skimmer, and credit cards that were seized at his residence and that they were used by him in manufacturing fraudulent credit cards. Bridges admitted to living at 16XXX Mark Twain, Detroit, Michigan. A records check with the Michigan Secretary of State indeed showed Keeman Bridges' registered address as 16XXX Mark Twain, Detroit, Michigan.

16. It should be noted that the United States Court of Appeals for the Sixth Circuit has determined statements against penal interests to be extremely reliable in the context of search warrant affidavits. *United States v. Barone*, 584 F.2d 118, 122 (6th Cir. 1978)("[t]hat some of the statements necessarily were against the penal interest of the informant weighs heavily in support of his reliability and is, we have held, a 'significant, and sometimes conclusive, reason for crediting the statements of an informant.'"); *United States v. Rosenbarger*, 536 F.2d 715, 719 (6th Cir. 1976)(affirming district court's finding of probable cause where informant implicated herself in criminal activity because "[s]uch a declaration against penal interest carries its own indicia of reliability.").

17. The Wonder Manual Embosser machine, MSR605 Magnetic Stripe Card Reader Writer Encoder, Dymo Label Maker, Lenovo Laptop computer, Apple Mac Book computer, and 29 fraudulent credit cards, are currently in storage at the

FBI's Detroit Field Office. In my training and experience, I know the items have been stored in a manner in which its contents are, to the extent material to this investigation, in substantially the same state as they were when the devices first came into the possession of the FBI.


18. Your affiant knows that the stolen credit card account numbers that were encoded on the fraudulent credit cards belongs to banks located in Canada and therefore affect foreign commerce.

### CONCLUSION

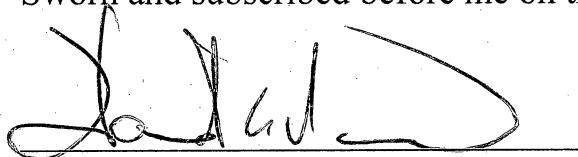
19. Based on the above facts, I have probable cause to believe that on February 20, 2016, Keeman Bridges, did knowingly and with intent to defraud, have custody and control over and possessed device-making equipment as defined by 18 U.S.C. § 1029(e)(6), to wit: a Wonder Manual Embosser machine, an MSR605 Magnetic Stripe Card Reader Writer Encoder aka credit card skimmer, a Dymo Label Maker, a Lenovo Laptop computer, an Apple Mac Book computer, and 29 fraudulent credit cards, and in doing so affected interstate and foreign commerce, in violation of 18 U.S.C. § 1029(a)(4) and (c)(1)(A)(ii), and Title 18, United States Code, Section 1029(a)(3) and (c)(1)(A)(i) (Possession of fifteen or more devices



which are Counterfeit and Unauthorized Access Devices) in the County of Wayne,  
Eastern Judicial District of Michigan.

  
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Joel Kelso, Special Agent  
Federal Bureau of Investigation

Sworn and subscribed before me on this 20<sup>th</sup> day of October, 2016.

  
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Hon. David R. Grand  
UNITED STATES MAGISTRATE JUDGE